01-0721



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SDMS# 204557

REGION 1 1 CONGRESS STREET, SUITE 1100 BOSTON, MASSACHUSETTS 02114-2023

March 15, 2004

Mr. Andrew T. Silfer Corporate Environmental Programs General Electric Company 100 Woodlawn Ave. Pittsfield, MA 01201

Via Electronic and U.S. Mail

Re:

Conditional Approval of General Electric's Work Plan Phase 3 Floodplain Properties, Group 3A, 3B, 3C, and 3D, 8 January 2004, General Electric/Housatonic River Project Site,

Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA) conditional approval for the predesign investigation activities to be conducted under *Work Plan Addendum B Phase 3 Floodplain Properties, Group 3A, 3B, 3C, and 3D* (Work Plan Addendum), submitted on January 8, 2004. The Work Plan Addendum is subject to the terms and conditions specified in the Consent Decree (CD) that was entered in U.S. District Court on October 27, 2002.

Pursuant to Paragraph 73 of the CD, EPA, after consultation with the Massachusetts Department of Environmental Protection (MDEP), approves the Work Plan Addendum subject to the conditions presented in this letter. Based on discussions among EPA, MDEP, and GE subsequent to submittal of the Work Plan Addendum, the scope of the soil investigations has been modified. The specific modifications are identified in this letter, as well as on revised versions of Figures 2, 3, 4 and 5 from the Work Plan Addendum, which are attached to this letter.

## **General Conditions:**

- 1. The Work Plan Addendum proposes that the pre-design soil sampling investigations be conducted in an iterative manner over progressive depth intervals. The initial sampling will focus only on polychlorinated biphenyls (PCBs). GE proposes to collect PCB samples to a maximum depth of 10 feet below ground surface, and analyze the samples in an iterative manner over increasing depth. GE shall return to the sample locations to obtain samples from deeper depth increments if the analytical data indicate that detectable PCBs extend below the proposed 8- to 10-foot depth increment.
- 2. For the majority of the properties, extensive prior PCB sampling has been conducted within the upper soil depths (top 2 feet) of the Actual/Potential Lawn areas on a grid-like pattern. The subsurface sampling proposed on individual residential properties shall be located in a uniform pattern, consistent with a grid-like sampling layout. Boring locations shall be uniformly spaced based on the existing PCB data and characteristics of the properties. The specific changes in boring locations GE shall implement in the proposed pre-design are identified in this letter and on the attached figures. However, EPA reserves the right to require additional sampling in the future if the data indicate that a more uniform grid or more dense sampling is required in

particular areas to support future RD/RA activities.

- 3. MDEP and EPA are concerned that the summer 2000 flooding event (10-year frequency storm) may have impacted certain surface soils within the 10-year floodplain due to deposition of river sediments suspended during the flood event. As a result, GE shall collect several additional surface soil samples (including in areas previously remediated as Short Term Measures (STMs) under the Massachusetts Contingency Plan), as shown on the attached figures.
- 4. On Figures 3, 4, and 5, of the Work Plan Addendum, the gray-shaded areas that represent the lateral extent of STMs do not appear to match sample locations and respective depth intervals as shown on the Work Plan Addendum tables and in the STM reports that were previously submitted to MDEP. In its next submittal on the Phase 3 properties, GE shall verify and correct, if necessary, any omissions or inconsistencies in these tables and figures.
- 5. The majority of the changes identified in this letter and the attached figures related to soil borings reflect EPA's rationale that deep borings should be advanced at locations where the greatest PCB concentrations have already been documented in shallower depth intervals and to better determine, the extent of PCBs at depth.
- 6. The Work Plan Addendum excludes the riverbank portions of the 1 1/2-Mile Reach where EPA will be performing removal actions. The EPA limit-of-excavation line for the section of the 1 1/2-Mile Reach from the Dawes Street Bridge to the confluence is currently in draft format. The EPA limit-of-excavation line will be provided to GE as soon as it is finalized.
- 7. EPA agrees with GE's proposed iterative approach to evaluate the need for and scope of sampling for other Appendix IX constituents at the Phase 3 properties. EPA reserves the right to require additional sampling in the future if the data indicate that more sampling is required in particular areas to support future RD/RA activities.

Conditions Specific to Phase 3, Groups 3A, 3B, 3C, and 3D Properties

Group 3A. Refer to Figure 2 (Attached).

## Lot 17-2-26

- 1. Replace surface sample 3A-SS-18 with boring 3A-SB-20 (from Lot I7-2-30).
- 2. Replace boring 3A-SB-20 with surface sample 3A-SS-18.
- 3. Move 3A-SS-15 and 3A-SS-16 to the east approximately 15ft closer to the 10-year floodplain.

### Lot 17-2-32

- 1. Move proposed boring location 3A-SB-19 slightly to the southeast to fall within the 10-year floodplain.
- 2. Add a new boring, 3A-SB-25, in the approximate center of the following previous sample locations: I7-2-32A-5; I7-2-32-C; and I7-2-32A.

3. Add a surface soil sampling location, 3A-SS-19, approximately 30 feet north of existing sampling location RB021602.

#### Lot 17-2-33

1. Add a new boring, 3A-SB-26, in the approximate center of the following previous sample locations: BS000127; R80AZ249; and R80AZ226.

### Lot 17-2-35

1. Move proposed boring, 3A-SB-6, to the approximate center of the following previous sampling locations: R47CZ269 and R47BZ284.

### Lot 17-2-46

1. Move location 3A-SB-1 to the southeast to a location behind the garage.

No revisions to the proposed sampling points on Lots 17-2-31, 17-2-36, 17-2-43, 17-2-45, and 17-2-46, except as discussed above.

Group 3B. Refer to Figure 3 (Attached).

## Lot 17-3-5

- 1. Move proposed boring 3B-SB-22 approximately 25ft south to property line between 17-3-4 and 17-3-5.
- 2. Add a new boring, 3B-SB-24, approximately 15ft northeast of RB021665.

## Lot 17-3-7

- 1. Move boring 3B-SB-7 approximately 20ft northwest to the approximate center of the following previous sample locations: R77FZ261; R77FZ250; R77EZ272; and R77EZ257.
- 2. Replace surface sample 3B-SS-20 with a new soil boring, 3B-SB-25, to provide spatial coverage in the vicinity of existing sampling location R77DZ278.
- 3. To provide better spatial coverage across the area where an STM was performed, add surface soil sampling locations as follows:
  - 3B-SS-20, approximately centered between existing locations I7-3-7D-9 and I7-3-7V;
  - 3B-SS-7, approximately centered between existing locations R77F239 and 3B-SS-19; and,
  - 3B-SS-28, approximately centered between existing locations I7-3-7D-7 and R70D225.

### Lot 17-3-10

- 1. Replace boring 3B-SB-2 with surface sample 3B-SS-6.
- 2. Replace surface sample 3B-SS-6 with boring 3B-SB-2.
- 3. Move boring 3B-SB-3 approximately 20ft northwest to location 3B-SB-7.
- 4. Move surface sample 3B-SS-7 to approximately center of R77F239 and 3B-SS-19 as described above for Lot 17-3-7.

No revisions to proposed sampling points on Lots 17-3-4, 17-3-8, and 17-3-11.

## Group 3C. Refer to Figure 4 (Attached).

#### Lot 17-2-1

- 1. Move location 3C-SS-24 approximately 15ft northeast to a location between existing sampling locations 3C-SB-26 and I7-2-1I.
- 2. Eliminate location 3C-SS-21.
- 3. Replace surface sample 3C-SS-22 with boring 3C-SB-24.
- 4. Replace boring 3C-SB-24 with surface sample 3C-SS-22.
- 5. To further evaluate previously remediated areas, add the following surface soil sampling locations:
  - 3C-SS-29, between existing sampling locations R63E000 and R63FZ024;
  - 3C-SS-30, between existing sampling locations R63FZ048 and R63EZ070; and,
  - 3C-SS-31, between existing sampling locations R63DZ097 and R63C100.

## Lot 17-2-2

1. Add surface soil sample location, 3C-SS-27, between existing sampling locations 17-2-2-1 and R90C125.

#### Lot 17-2-3

1. Add a surface sample location, 3C-SS-28, approximately centered between R59A100 and R59B075.

#### Lot 17-2-20

- 1. Move proposed surface soil sampling location 3C-SS-16 northwest to a location northeast of existing sampling location SL0202, so that it lies in a topographically lower area to better define the extent of contamination of surface soils within the 10-year floodplain.
- 2. Add a surface soil sample location, 3C-SS-25, between existing sampling locations SB-19, SLO197, and I7-2-20-10.
- 3. Add a surface soil sample location, 3C-SS-26, between existing sampling locations R94B120 and I7-2-20-12.
- 4. Add a surface soil sample location, 3C-SS-32, between existing sampling locations 17-2-20-20 and 17-2-20-17.

Group 3D. Refer to Figure 5 (Attached).

#### Lot 17-3-1

- 1. Add a surface sample location, 3D-SS-16, between existing sampling locations R97HZ226 and R97I200.
- 2. Add a surface sample location, 3D-SS-17, between existing sampling locations R97I150 and R97J125.
- 3. Add a surface sample location, 3D-SS-18, between existing sampling locations R97F125 and R97E100.

#### Lot 17-3-2

1. Move proposed soil boring location 3D-SB-1 approximately 15ft southwest to the vicinity of existing sampling location R64D086.

#### Lot 17-99-000

- 1. Move boring 3D-SB-5 approximately 15 to 20ft west to a lower elevation.
- 2. Add a surface soil sampling location, 3D-SS-19, between existing sampling locations R97L150 and R97N125.
- 3. Add a surface sample location, 3D-SS-20, between I7-99-000B-7 and I7-99-000R.
- 4. Replace surface sample 3D-SS-6 with boring at 3D-SB-7.
- 5. Replace boring 3D-SB-7 with surface sample 3D-SS-6.

EPA reserves its right to perform and/or require additional sampling and/or Response Actions, if necessary, in the floodplain parcels located in the 1 1/2 mile Reach of the Housatonic River to meet the requirements of the Consent Decree. GE shall initiate field work for the above mentioned properties within two weeks of the date of this letter. The PCB analytical results from this sampling shall be provided to EPA as available as part of the monthly CD status reports. All PCB data shall be available for inclusion in these status reports within 3 months of the date of this letter (the actual date of the last data submittal to EPA may extend slightly beyond 3 months to reflect the timing of submittal of that CD monthly status report). Finally, the PDI Report for the Phase 3, Group 3A, 3B, 3C, and 3D properties shall be submitted to EPA within 5 months of the date of this letter.

If you have any questions, please contact me at (617) 918-1268.

Sincerely,

Michael 0. Nalipinski Remedial Project Manager

**GE/Housatonic River Project** 

cc: Richard Gates. GE

James Bieke,

Shea & Gardner

James Nuss, Susan Steenstrup, BB&L

**MDEP** 

Dawn Jamros, Joe Mastone,

Weston Solutions, Inc. Weston Solutions, Inc.

K.C. Mitkevicius,

ACOE\*

Dean Tagliaferro,

**EPA** 

Holly Inglis,

**EPA** 

Jim Dilorenzo

**EPA** 

**Public Repositories** 

Rose Howell.

EPA\*

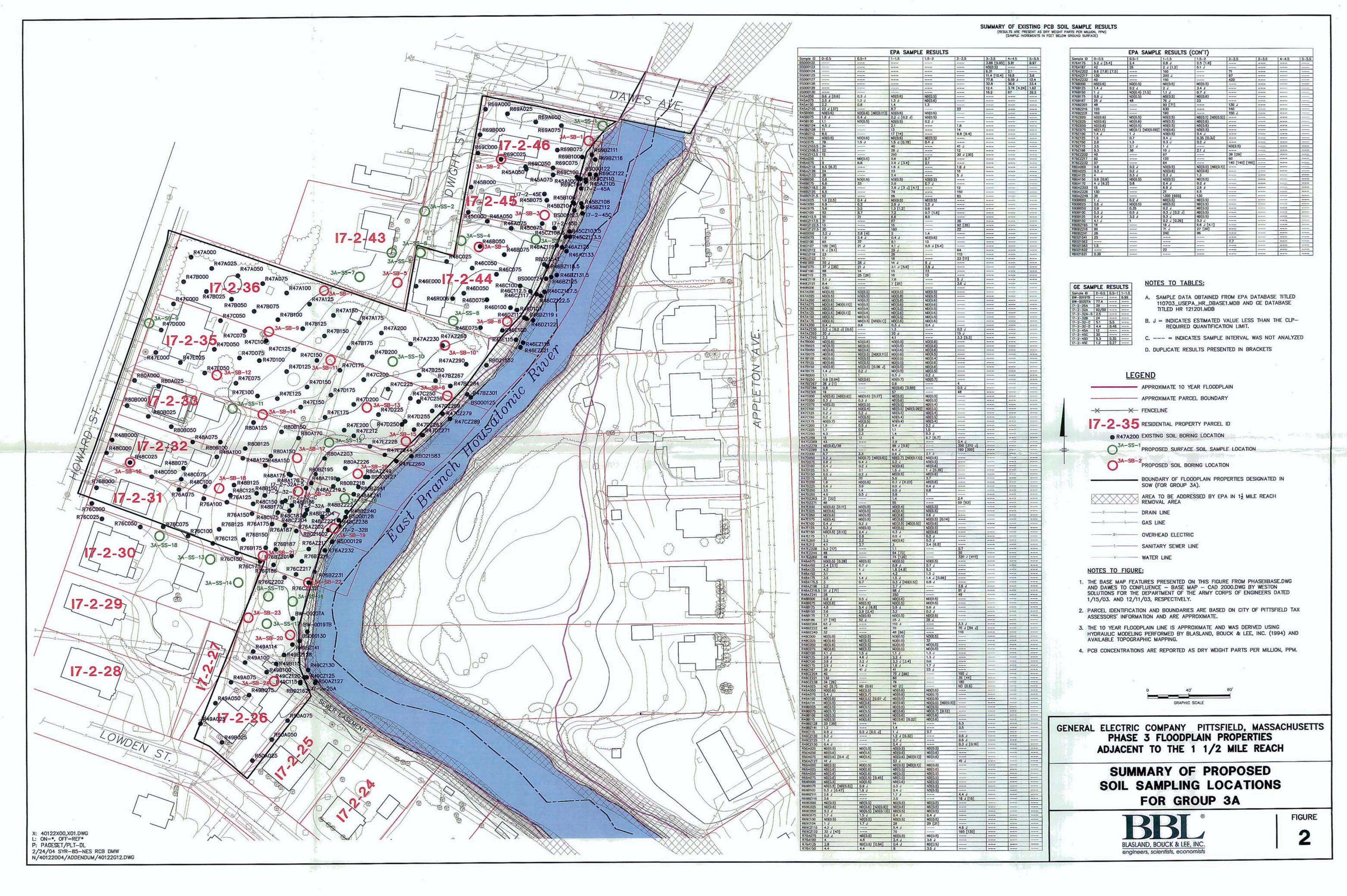
Tim Conway,

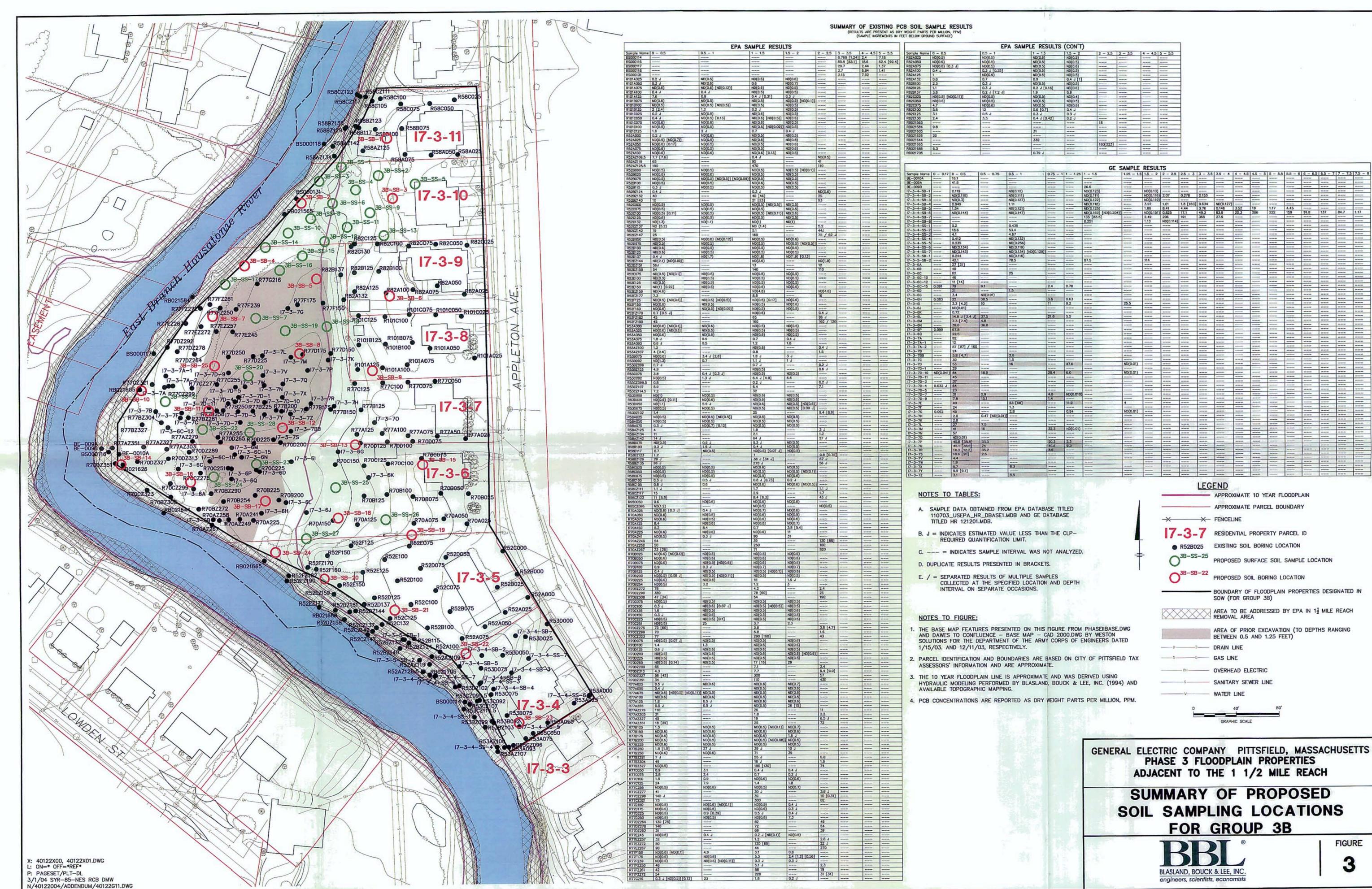
EPA\*

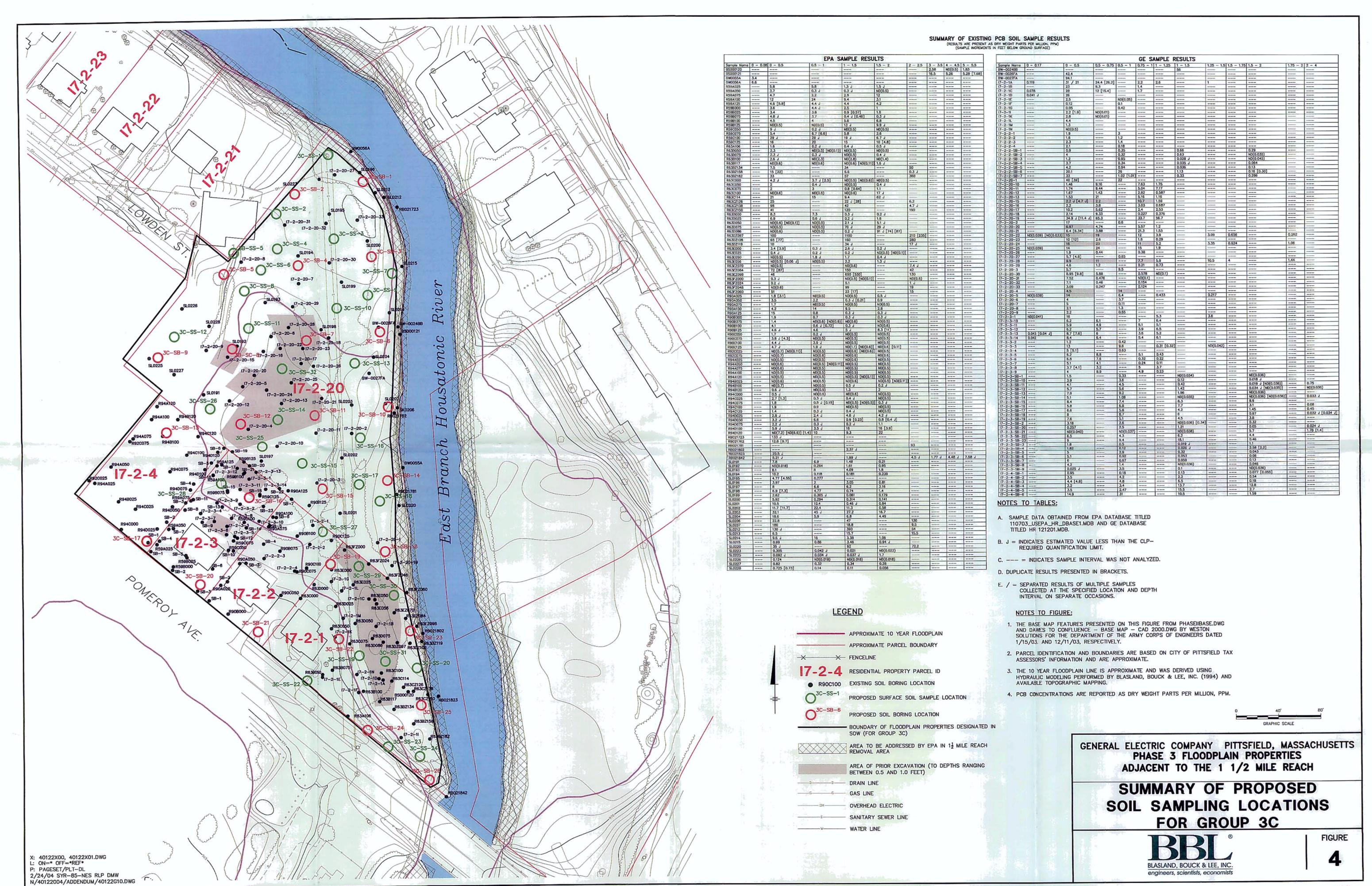
John Kilborn,

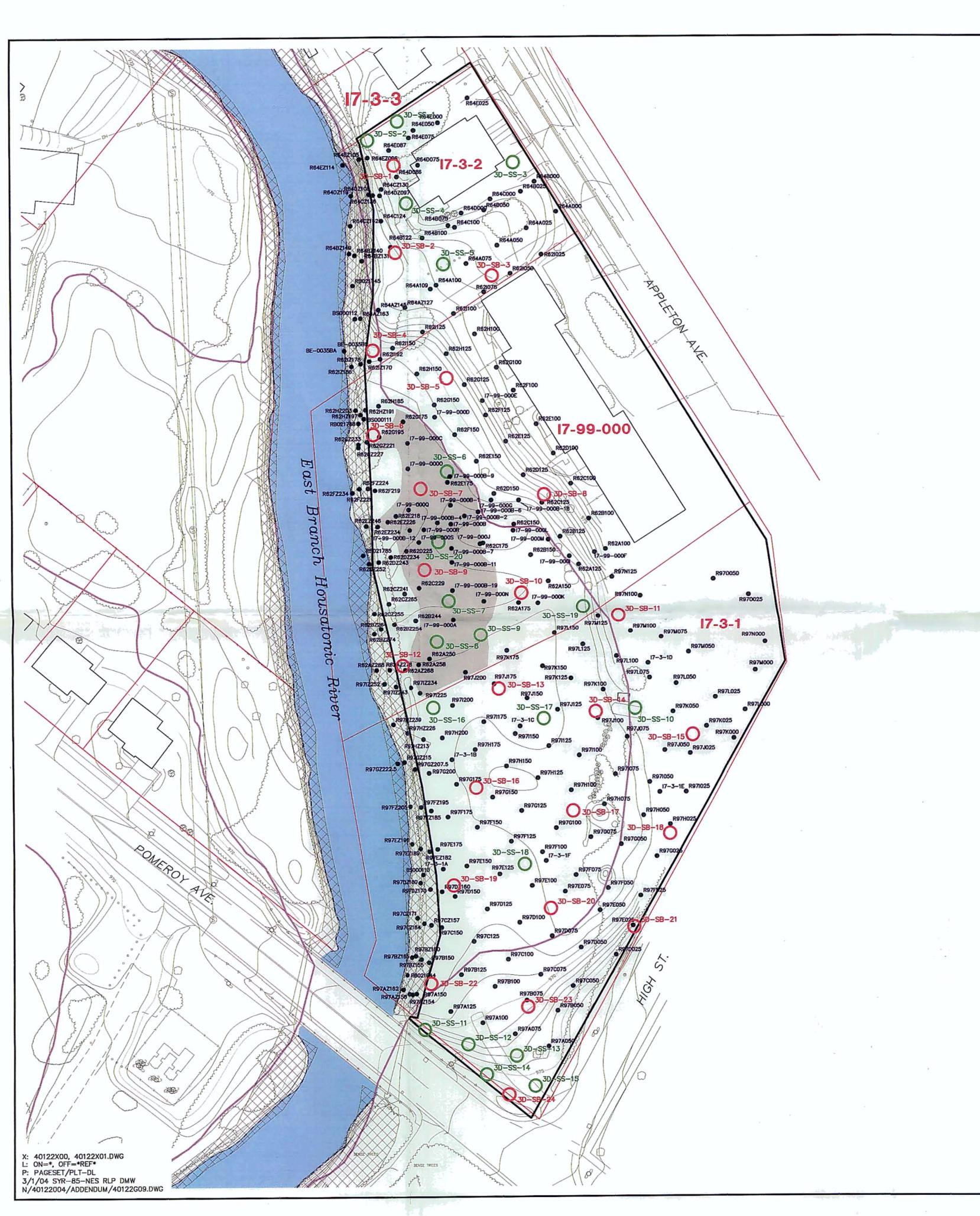
EPA\*

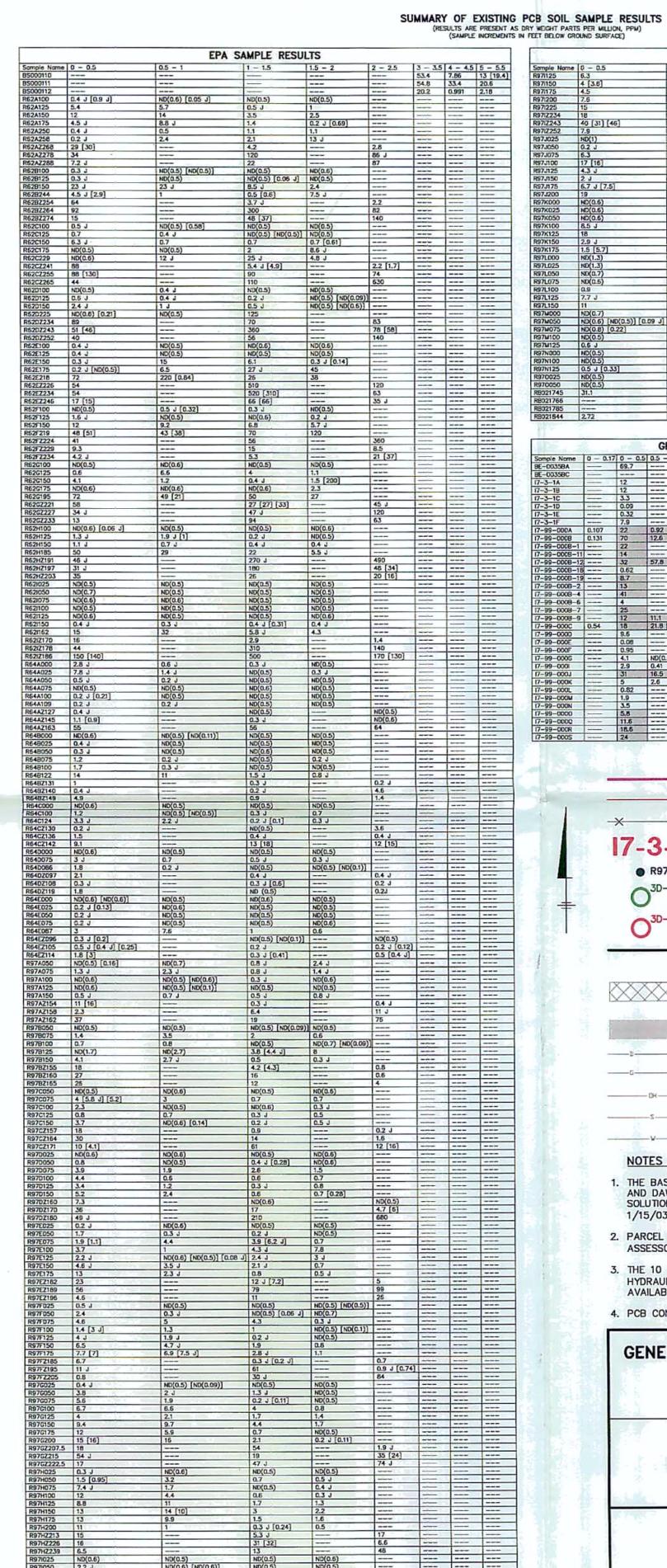
<sup>\*</sup>without attachments

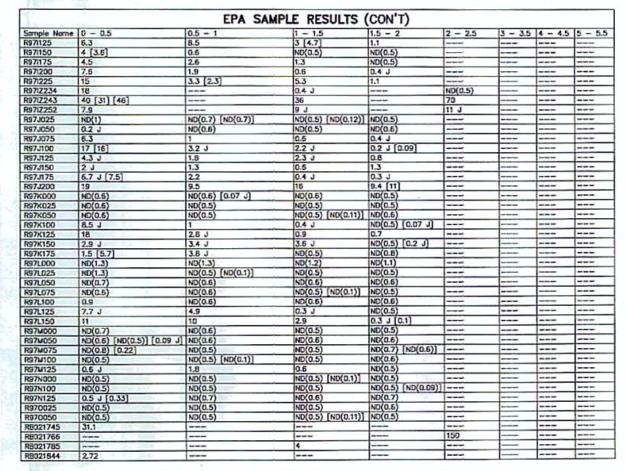












Somple Name	0 - 017	0 - 05	0.5 - 0.75	05 - 1	0.75 1	1 - 125	1.25 - 1.5	1.5 - 1.75	2 - 25	NOTES TO TABLES:
BE-DO35BA	U - 0.17	69.7	0.5 - 0.75							
BE-0035BC									12.5	
17-3-1A		12								A. SAMPLE DATA OBTA
17-3-1B		12			_					
17-3-1C		3.3		6.5						EPA DATABASE TITLED
7-3-1D		0.09		ND(0.05)						110703_USEPA_HR_DBA
7-3-1E	-0-03	0.32		-						GE DATABASE TITLED H
7-3-1F		7.9		1.8						GE DATABASE TITLED IT
7-99-000A	0.107	22	0.92							
7-99-0008	0.131	70	12.6		3.2	2	1.8			B. J = INDICATES ESTIM
7-99-000B-1		22								
7-99-000B-11		14				_				LESS THAN THE CLP-RI
7-99-0008-12		32	57.8		70	144	12.7			QUANTIFICATION LIMIT.
7-99-0008-18		0.62								
7-99-0008-19		8.7								
7-99-0008-2		13								C = INDICATES S
7-99-0008-4		41								INTERVAL WAS NOT ANA
7-99-0008-6		4								INTERNIE INC. INC. III.
7-99-0008-7		25								
7-99-0003-9		12	11.1		2.6					D. DUPLICATE RESULTS
17-99-000C	0.54	18	21.8 [26]		36.7	23.3	6.1	ND(0.01)		BRACKETS.
7-99-0000		9.6		0.51					-	DIVACILE 13.
7-99-000E		80.0		ND(0.05)						
17-99-000F		0.95	2 3	0.96						
17-99-000G		4.1	ND(0.01)							
17-99-000	555	2.9	0.41							
17-99-000J		31	16.5		-14	ND(0.5)				
17-99-000K		5	2.6		ND(0.01)					
7-99-000L		0.82								
17-99-000M	-	1.9						'		
17-99-000N		3.5		THE STATE OF						
17-99-0000		5.8		1.3		10.7				0 40'
17-99-000Q		11.6	X	23		2.1				
17-99-000R	-	18.6		4.3		2.5				0010110 0
17-99-000S		24		41.3		11.2				GRAPHIC S

SAMPLE DATA OBTAINED FROM

DATABASE TITLED 1703\_USEPA\_HR\_DBASE1.MDB AND DATABASE TITLED HR 121201.MDB

J = INDICATES ESTIMATED VALUE THAN THE CLP-REQUIRED ANTIFICATION LIMIT.

--- = INDICATES SAMPLE ERVAL WAS NOT ANALYZED. DUPLICATE RESULTS PRESENTED IN

GRAPHIC SCALE

APPROXIMATE 10 YEAR FLOODPLAIN APPROXIMATE PARCEL BOUNDARY

X FENCELINE

7-3-2 RESIDENTIAL PROPERTY PARCEL ID

R970050 EXISTING SOIL BORING LOCATION

PROPOSED SURFACE SOIL SAMPLE LOCATION

PROPOSED SOIL BORING LOCATION

- BOUNDARY OF FLOODPLAIN PROPERTIES DESIGNATED IN SOW (FOR GROUP 3D)

AREA TO BE ADDRESSED BY EPA IN 12 MILE REACH REMOVAL AREA

AREA OF PRIOR EXCAVATION (TO DEPTHS RANGING BETWEEN 0.5 AND 1.25 FEET)

----GAS LINE

OVERHEAD ELECTRIC

SANITARY SEWER LINE

# NOTES TO FIGURE:

- THE BASE MAP FEATURES PRESENTED ON THIS FIGURE FROM PHASEIBASE.DWG AND DAWES TO CONFLUENCE BASE MAP CAD 2000.DWG BY WESTON SOLUTIONS FOR THE DEPARTMENT OF THE ARMY CORPS OF ENGINEERS DATED 1/15/03. AND 12/11/03, RESPECTIVELY.
- 2. PARCEL IDENTIFICATION AND BOUNDARIES ARE BASED ON CITY OF PITTSFIELD TAX ASSESSORS' INFORMATION AND ARE APPROXIMATE.
- THE 10 YEAR FLOODPLAIN LINE IS APPROXIMATE AND WAS DERIVED USING HYDRAULIC MODELING PERFORMED BY BLASLAND, BOUCK & LEE, INC. (1994) AND AVAILABLE TOPOGRAPHIC MAPPING.
- 4. PCB CONCENTRATIONS ARE REPORTED AS DRY WEIGHT PARTS PER MILLION, PPM.

GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS PHASE 3 FLOODPLAIN PROPERTIES ADJACENT TO THE 1 1/2 MILE REACH

SUMMARY OF PROPOSED SOIL SAMPLING LOCATIONS FOR GROUP 3D

engineers, scientists, economists

**FIGURE** 

JOM = 204 557